

# Rocky Flats Cleanup Commission

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Environmental Restoration Program  
U.S. Department of Energy  
Rocky Flats Office  
P.O. Box 464  
Golden, CO 80402-0464

November 9, 1989

Re: Comments on the Interim Remedial Action for 881 Hillside

Dear Sirs:

The Rocky Flats Cleanup Commission has reviewed the IRA for 881 Hillside and our detailed comments are attached. We also have the following general concerns regarding this first cleanup action.

First of all, the public should be aware that this document describes the cleanup of only 12 of the 166 polluted sites at Rocky Flats. These sites contain cancer-causing volatile organic compounds and uranium tainted soils that have leached into the groundwater. These sites have been given priority for cleanup because the volatile organic compounds have percolated down to the groundwater which enters Woman's Creek which drains into Stanley Reservoir, the drinking water supply for the northern suburbs. To put this cleanup proposal in another perspective; it will cost approximately \$6 million to construct and operate compared to an estimate of \$1 billion to cleanup the entire plant site. Therefore, while the RFCC is very excited that cleanup is finally progressing, this action is only the tip of the iceberg; or should we say the tip of the trash pile.

The public should also be aware that cleanup will take a very long time at the rate DOE is progressing. The purpose of the IRA is to begin cleanup on a temporary basis until a permanent solution can be agreed upon. Unfortunately, the temporary solution will not be operational until the Spring of 1991, about a year and a half away from now. This is not acceptable. Cleanup should be accelerated at the plant.

It is unclear when the permanent solution for these 12 sites will be in place because no schedule has been produced by DOE. This schedule is to be outlined in an Intergovernmental Agreement (IAG) which was due in October. In fact the permanent solution has been under study since 1987 when work began on the Remedial Investigation/Feasibility Study 881 Hillside. These reports have still not been completed because of the inadequacies in the draft reports. The following inadequacies were identified by the DOE Special Assignment Environmental Team in their Report entitled "Assessment of the Environmental Conditions at the Rocky Flats Plant", dated August 1989:

There is inadequate background characterization for metals and radionuclides primarily because there was only one background well drilled up gradient of the site to determine what contamination is being generated on-site versus off-site.

There is a poorly defined extent of contamination because of the few number of test wells (33).

There is inadequate quality control of testing so the data may not be valid.

Therefore, DOE admits that their past studies have been flawed and that a permanent solution cannot be defined until one completely understands the problem. The RFCC requests that these inadequacies be corrected as soon as possible so that a final cleanup solution can be implemented.

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While the IRA proposes to construct a french drain to collect the pollutants which are leaching into the groundwater, nothing is being proposed to cleanup the contaminated soils. The RFCC is concerned that the citizens and workers downwind of the construction of the drain may be contaminated by the radioactive dust disturbed on the surface of the ground. The RFCC wants to review a Health and Safety Plan which describes how the workers and community will be protected during construction. The RFCC does not want the cleanup to create additional health risks to the workers and the community like that which was experienced at the Rocky Mountain Arsenal. The RFCC also wants adequate monitoring to be in place during construction so that environmental standards are not exceeded.

Finally, the RFCC wants to see a Community Involvement Plan which outlines how the community will be informed of the progress of the cleanup and given assurance that environmental standards are being met.

